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OU 7 IM/IRA/EA DD and PAM Project Team AGNEDA



Wednesday, May 17, 1995

MA 00:01 Interlocken, Small West Conference Room

Leachate Collection Proposed Action Memorandum

- Schedule for submission to EG&G/DOE
- Is a review necessary on this revision?
- Passive Treatment System
- Conceptual design requirements single work design
- Landfill IM/IRA Decision Document
- Pond water management after closure 12 policy existing outlet Schedule for submission to EG&G/DOE
- Point of compliance Nature and extent of contamination downgradient of the landfill
- **NRDA** Presentation
- Next Agency Meeting
- Miscellaneous

Next Meetings:

May 31, 1995 - Interlocken, small west conference room May 24, 1995 - Interlocken, small west conference room

UNDOER WINDS

May 19, 1995 2510-95/60

Ms. Laurie Peterson-Wright EG&G Rocky Flats, Inc. P.O. Box 464, Bldg. 080 Golden, Colorado 80402-0464

Subject:

Submittal of May 17, 1995 Meeting Minutes

Technical Working Group Meeting for Operable Unit No. 7

(MTS Contract 353017TB3)

Dear Ms. Peterson-Wright:

Enclosed are meeting minutes to document the May 17, 1995, technical working group meeting for the OU 7 landfill closure interim measure/interim remedial action and environmental assessment

If you have any questions, please contact me at your convenience.

Sincerely,

Myra Vaag

Project Manager

Enclosure

cc:	W. Bartholomew w/o	o EG&G	B. Caruso	Stoller
	T. Lindsay	EG&G	M. Eisenbeis	Stoller
	P. Martin	EG&G	K. Fiebig	Stoller
	P. Corser	TerraMatrix	S. Franklin	Stoller
			C. Gee	Stoller
			J. Jankousky	Stoller
			D. Palmer	Stoller
			B. Stephanus	Stoller
			MKV Chron w/o	

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Minutes for the OU 7 Landfill Closure IM/IRA/EA DD Technical Working Group Meeting May 17, 1995

The following topics were discussed:

Leachate Collection and Treatment PAM

The schedule for submission of the Draft Leachate Collection and Treatment PAM to EG&G and DOE has been revised to June 2, to allow time for preparation of the conceptual design. The document will be submitted to CDPHE and EPA on June 15. The next agency meeting will coincide with submittal of the PAM to CDPHE and EPA. Review by EG&G and DOE will be limited to key personnel to streamline the process (L. Brooks, L. Guinn, and J. Fauble at EG&G). CDPHE and EPA will have two weeks to review the revised Draft Leachate Collection and Treatment PAM.

Revisions to the document will be limited. The conceptual design and description of the conceptual design will be changed, an ARARs (or performance objectives) table will be included, discharge monitoring to evaluate performance of the system will be stated, and waste management issues will specified (all waste generated during construction and treatment will be disposed in the landfill).

Design of the passive treatment system has not yet begun. EG&G has prepared a statement of work, and the procurement process for the CSM contract has been started. It is assumed that single containment would be adequate because the leachate is not undergoing active management under RCRA. The existing excavation permit may be used. A fugitive dust permit is needed. A health and safety plan or an addendum to the existing health and safety plan will be needed. A transfer of water from the East Landfill Pond to the Aseries ponds will be needed in June or July before construction begins.

The wetlands assessment needs to be revised. EG&G will revise the assessment. DOE will include the revised assessment in a letter to the US Fish and Wildlife Service.

Slurry Wall Maintenance Action

The preliminary design, draft technical specifications, and draft construction quality assurance plan will be reviewed internally at Stoller in the next two weeks. Construction of the slurry wall is scheduled for October 1996 using FY97 funds. Well abandonment is scheduled for October 1995 using FY96 funds. DOE would like to swap scope and construct the slurry wall in October 1995.

Landfill Closure IM/IRA/EA Decision Document

The schedule for submission of the Draft Landfill Closure IM/IRA/EA Decision Document to EG&G and DOE has been revised to July 13. To meet the August 31 milestone for submittal of the draft to CDPHE and EPA, DOE and EG&G will have three weeks to review the decision document (August 3), Stoller will have three weeks to revise the document (August 24), and EG&G and DOE will have one week to transmit the document to the agencies.

The Landfill Closure IM/IRA/EA Decision Document will serve as the CAD/ROD for OU 7. Appropriate language should be inserted in the text for the CAD/ROD. EG&G will check with their regulatory staff on the language to use. After the landfill is capped, discharge from the pond will be accomplished by water transfers to the A-series ponds or through the outlet in the dam. The existing valve may have to be repaired or

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replaced. EG&G will check with their regulatory staff to determine if an NPDES permit will be required for discharge.

Stoller presented an evaluation of analytes in groundwater downgradient of the landfill using data tables, time-series plots, and isoconcentration maps. Chloride, nitrate/nitrite, selenium, and sulfate consistently exceed ARARs in groundwater from monitoring wells 0786, 4087, 4187, B206789, B206889, B206989, and B207189, downgradient of the landfill. Analytes in groundwater from wells 52894, 53094, 53194, and 4287 do not exceed ARARs. These wells could be recommended for use in the post-closure monitoring program. Well 53194 could be recommended as the point of compliance.

Of the analytes that exceed ARARs, only selenium poses a risk to human health. However, selenium may not be a contaminant resulting from waste disposal at the landfill or at the OU 6 trenches; it may be leached out of the bedrock claystones by groundwater. From these data, it appears that the groundwater does not require treatment for final closure. ARARs waivers should be requested for chloride, nitrate/nitrite, and sulfate because these analytes pose no risk to human health. Groundwater containing elevated concentrations of selenium will be contained under the landfill cap. Modeling could be performed to show that the selenium will not reach the point of compliance during the 30-year post-closure period.

Leachate treatment will not be proposed as part of the final remedy. Because the landfill is currently in use and is an active RCRA unit, CPDHE is requiring leachate collection and treatment. After closure, the landfill will no longer be an active RCRA unit and leachate treatment will not be required becasue there is no risk to human health from analytes in the leachate.

Natural Resource Damage Assessment (NRDA) Presentation

According to the US Fish and Wildlife Service, Rocky Flats is out of compliance with Section 7 of the Endangered Species Act. DOE and/or EG&G are planning to perform a biological assessment of the drainages and holding ponds. The schedule for the biological assessment is unknown. DOE is attending the NRDA presentation on May 25. Stoller will prepare handouts for DOE including fact sheets, a map, and color photographs that outline the history of the site and proposed actions that may affect wetlands and Preble's meadow jumping mouse habitat.

The US Fish and Wildlife Service is also interested in determining the effect that the holding ponds at Rocky Flats have on recharge to the South Platte River. Water consumption or depletion by Rocky Flats may be affecting the habitat of the whooping crane in Nebraska, which is an endangered species. However, removing the dam and the East Landfill Pond may adversely affect the habitat of the Preble's meadow jumping mouse at Rocky Flats. Stoller will help DOE calculate the water depletion in the South Platte River as a result of the pond.

Next Agency Meeting

The next agency interface meeting will be the week of June 12, when the revised Leachate Collection and Treatment PAM is submitted. Bob Siegrist of CSM will give a technical presentation on the conceptual design for passive treatment. Using the Landfill Closure IM/IRA/EA Decision Document as the final CAD/ROD and the nature of public involvement in the IM/IRA process will be discussed. One public meeting and one review and comment period for the IM/IRA/EA Decision Document, which includes the closure plan, post-closure monitoring plan, and the CAD/ROD, will be proposed.

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Action Items

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01-231	Completed.
232	Research RCRA regulations to determine if treatment for F039 listed waste is required under RCRA corrective action, and if so, do treatment standards have to be met (L. Peterson-Wright, EG&G, and M. Vaag, Stoller). In progress.
233	Completed.
234	Research VHS modeling, exposure scenario used, and location of hypothetical receptor well for delisting under CERCLA (J. Jankousky, Stoller). In progress.
235	Keep current on Pond Water IM/IRA issues (L. Peterson-Wright, EG&G). In progress.
236-242	Completed.
243	Investigate delisting strategy under RCRA (talk to G. Guinn, EG&G). Is a CDPHE conservative screen required? Can CERCLA delisting be used for no further action? (L. Peterson-Wright, EG&G, and M. Vaag, Stoller). Delisting will be proposed in the Landfill Closure IM/IRA/EA Decision Document. Completed.
244	Check regulations for each ARAR to determine if mean values or maximum values should be used to compare to the standard (S. Franklin, Stoller). Mean concentrations should be used when comparing to standards except when using MCLs from the Safe Drinking Water Act. Completed.
245-246	Completed.
247	Obtain a copy of the new flow chart for F039 determination, which is Figure 1 in the proposed Closure Strategy for OU 7 (L. Peterson-Wright, EG&G).
248	Keep current on sitewide point-of-compliance issues (L. Peterson-Wright, EG&G). In progress.
249	Determine threshold levels for HAP permitting requirements (L. Peterson-Wright, EG&G).
250	Revise groundwater and surface water ARARs for radionuclides in accordance with DOE Order 5400.5 (S. Franklin, Stoller). In progress.
251-254	Completed.
255	Collect a sample of pond water for compatibility tests (T. Lindsay, EG&G).
256	Request comments from CDPHE and EPA on the Proposed Closure Strategy for OU 7 (P. Witherill, DOE).
257	Distribute a memorandum asking for IDM and other waste material to help fill the volume of space remaining in the Present Landfill before closure in 1997 (T. Lindsay, EG&G). In progress.
258	Determine if leachate collection and passive treatment system can be single contained, rather than double contained (L. Peterson-Wright, EG&G).

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259	Talk to construction management about installing the passive treatment system at the leachate seep (L. Peterson-Wright, EG&G).
260	Obtain information from Bob Segrist at CSM about building the passive treatment system at CSM and characterizing the reactor materials (L. Peterson-Wright, EG&G).
261	Obtain a fugitive dust permit for construction of the leachate collection and treatment system (L. Peterson-Wright, EG&G).
262	Revise wetlands assessment for the new Leachate Collection and Treatment PAM (L. Peterson-Wright, EG&G).
263	Research information for the Landfill Closure IM/IRA/EA Decision Document including language for a CAD/ROD, permit for discharge of pond water, groundwater ARARs for radionuclides, and ARARs waivers (L. Peterson-Wright, EG&G).
264	Have Mary Siders of EG&G peer review the downgradient groundwater data (L. Peterson-Wright, EG&G).
265	Research the nature and extent of contamination in the OU 6 IHSSs (J. Jankousky, Stoller).
266	Determine the concentration of selenium at the compliance well through time using contaminant transport modeling (J. Jankousky, Stoller).
267	Look at CAD/RODs for other landfills to determine if ARARs waivers have been successfully used for contaminants in groundwater/leachate (M. Eisenbeis, Stoller).
268	Determine the change in water consumption/depletion in the South Platte River as a result of the dam and the East Landfill Pond at OU 7 for the Natural Resource Damage Assessment (J. Jankousky, Stoller).

Next Meeting

The meeting for May 24 has been canceled because of the Liner Technology and New Techniques in Geosynthetics Construction Seminar.

The next meeting will be at 10:00 a.m. on May 31, 1995, in the small west conference room at EG&G. The topics of discussion include the passive leachate treatment system, the revised Leachate Collection and Treatment PAM, and the Landfill Closure IM/IRA/EA Decision Document.

List of Attendees

Name	Organization	Phone
Mary Eisenbeis	Stoller	546-4474
John Jankousky	Stoller	546-4412
Tom Lindsay	EG&G	966-6985
Pete Martin	EG&G	966-8695
Laurie Peterson-Wright	EG&G Project Manager	966-8553
Paul Pigeon	RTG/DOE Support	966-5611
Paul Singh	ORNL-RFFO	966-3490
Myra Vaag	Stoller Project Manager	546-4417
Peg Witherill	DOE Project Manager	966-6585